



SECURITIES AND EXCHANGE COMMISSION
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July 31, 2020

VIA ECF

Honorable Leda Dunn Wettre
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: U.S. Securities and Exchange Commission v. Ieremenko, et al.
Case No. 19-cv-00505 (MCA)(LDW)

Dear Judge Wettre,

Pursuant to the Court's instruction during the July 21, 2020 status conference, the parties jointly propose the following deadlines for the completion of expert discovery in the above-referenced matter:

Plaintiff's initial expert reports due on December 18, 2020

Defendants' initial and rebuttal reports due on January 22, 2021

Plaintiff's reply reports due on February 19, 2021

Completion of all expert discovery by March 26, 2021

As directed, the parties also advise that they are available for mediation between October 13, 2020 and October 23, 2020.

Thank you again for your attention to this matter, and we are happy to discuss this or any other issue should the Court so direct.

Respectfully submitted,

/s/ Stephan Schlegelmilch
Counsel for Plaintiff

/s/ Sean Prosser
*Counsel for Defendant S. Cho and
Relief Defendant K. Cho*

/s/ Marc Litt
Counsel for Defendants Olefir and
Capyield

cc: Counsel of record (via ECF)